

# **ENRON**

## **NORTHERN NATURAL GAS COMPANY**

P.O. Box 1188      Houston, Texas 77251-1188 (713) 853-6161

January 3, 1994

Mr. Walt Kelly, Director  
Minnesota Office of Pipeline Safety  
175 Aurora Ave.  
St. Paul, Minnesota 55103-2356

Re: Request for specific information, Document #1575

Dear Mr. Kelly,

Your letter of November 30, 1993 requests follow up information regarding the Owatonna, Minnesota inspection done during May, 1993 by the Minnesota Office of Pipeline Safety (MnOPS). In response to your request Northern Natural Gas Co. (Northern) submits the following.

It is Northern's policy to comply with all applicable federal and state regulations including the pipeline safety regulations. As an agent for the Federal Office of Pipeline Safety (OPS), one of MnOPS's [sic] primary functions is to inspect for compliance with the federal pipeline safety regulations. Because MnOPS is concerned with enforcing compliance, Northern believes that it is very important that MnOPS follow the regulations they are helping to enforce, when they apply. The main regulations that apply to MnOPS are the regulations affecting inspections and follow-up to those inspections.

In Part 190, §190.203(c), it is very clear that the authority for sending "Request for Specific Information" letters rests with OPS and not MnOPS. §190.203(c) states:

"If...the OPS believes that further information is needed ... OPS may send the owner or operator a "Request for Specific Information" to be answered within thirty days after receipt of the letter."

The term OPS is defined in Section 190.3(e) as:

"OPS means the Office of Pipeline Safety, which is part of the Research and Special Programs Administration, U.S. Department of Transportation."

While under §190.203(a) agents are authorized to do inspections for OPS, there is no indication that agents are authorized to send out Request for Specific Information letters or to do other enforcement actions. Northern is responding to this letter as a courtesy to MnOPS and to demonstrate Northern's desire to

cooperate with MnOPS and OPS in all pipeline safety matters. However, Northern feels that it is very appropriate that in the future these letters be submitted by the Kansas City OPS Office and not by MnOPS

The blasting in question occurred in July, 1990 on the Chatfield branch line, MNB 73501. The Chatfield branch line is a 3.5 inch OD, 0.216 wall, grade B, 800 psi MAOP Pipeline. The branch line is about 1,087 miles long. The blasting occurred at about mile post 0.575. Prior to the blasting Northern determined the safe blasting situation following Engineering Standard (ES) 7155 (copy attached). All blasting was conducted following the parameters determined by ES 7155.

Northern's written damage prevention program is Procedure 80.102 (copy attached). Procedure 80.102 paragraph PROCEDURE: IX. B. states:

"If blasting occurs and it is determined there is possible damage, a leakage survey must be done immediately thereafter...."

The purpose of Northern's ES 7155 is to allow determination of what the allowable degree or level of blasting may be so that damage does not occur. It is Northern's position that if blasting follows ES 7155 no possible damage will occur and there is no need to conduct leakage surveys immediately after the blasting. For the record, a scheduled leakage survey was conducted in November, 1990 and no leaks were found.

On June 11, 1993 I called the MnOPS office and discussed the above items regarding blasting with Ms. Victoria Livshits. In that call, I told Ms. Livshits that the blasting was in July, 1990 and we did not do a leakage survey after the blasting because the blasting was done per ES 7155 and there was no reason to suspect that damage would occur.

If MnOPS has the need for additional informal follow-up information regarding any inspection that MnOPS does for the Federal OPS, future informal written requests for this information should be directed to myself at the above address or I may be reached at (713) 646-7343. Consistent with Northern's policy to comply with all regulations and to cooperate with any regulatory office having jurisdiction, Northern will continue to respond to such requests for information. However, as pointed out above, Northern prefers that official Request for Specific Information, 30 day letters and other such formal enforcement items be issued by the Federal OPS Office in Kansas City.

Sincerely,

John Wm. Caskey  
Code Compliance Engineer